

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

<div>TQ DELTA, LLC, Plaintiff, v. COMCAST CABLE COMMUNICATIONS LLC, Defendant.</div>	C.A. No. 15-cv-611-RGA
<div>TQ DELTA, LLC, Plaintiff, v. COXCOM LLC and COX COMMUNICATIONS INC., Defendants.</div>	C.A. No. 15-cv-612-RGA
<div>TQ DELTA, LLC, Plaintiff, v. DISH NETWORK CORPORATION, DISH NETWORK L.L.C., DISH DBS CORPORATION, ECHOSTAR CORPORATION and ECHOSTAR TECHNOLOGIES, L.L.C., Defendants.</div>	C.A. No. 15-cv-614-RGA
<div>TQ DELTA, LLC, Plaintiff, v. TIME WARNER CABLE INC. and TIME WARNER CABLE ENTERPRISES LLC. Defendants.</div>	C.A. No. 15-cv-615-RGA

TQ DELTA, LLC,

Plaintiff,

v.

VERIZON SERVICES CORP.,

Defendant.

C.A. No. 15-cv-616-RGA

PLAINTIFF TQ DELTA’S MOTION TO EXPEDITE

Plaintiff TQ Delta, LLC (“TQ Delta”) hereby moves for an order expediting briefing and resolution of its Motion to Amend the Scheduling Order, filed contemporaneously herewith. In support of this motion, TQ Delta respectfully states as follows:

The deadline for the parties to serve rebuttal expert reports is this Friday, September 2, 2022. TQ Delta served its damages reports on Defendants on May 12, 2022. The Special Master struck portions of those reports on August 11, 2022 (“SMO #21”) (D.I. 492, 498). In view of SMO #21, TQ Delta intends to file a motion to supplement its damages report and to file written objections to SMO #21 prior to September 2nd.

Concurrently with this motion, TQ Delta is filing a Motion to Amend the Scheduling Order to extend the deadline for serving rebuttal reports 30 days after the resolution of the later of TQ Delta’s written objections to SMO #21 and TQ Delta’s motion for leave to serve supplemental expert reports.

This proposed new schedule would provide Defendants’ experts with adequate time to prepare and serve reports in rebuttal to TQ Delta’s damages reports, whether the reports be in their original form (should the Court reverse SMO #21), an amended form (should the Court grant TQ Delta’s motion for leave to serve supplemental damages reports), or in the stricken form (should the Court not reverse SMO #21 and deny TQ Delta’s motion for leave). The proposed schedule would also help avoid a situation where Defendants serve rebuttal reports on September 2nd to

stricken versions of TQ Delta's damages reports but then later have to respond to different versions of those reports should the Court grant TQ Delta's motion for leave to supplement the reports or reverse SMO #21 in view of TQ Delta's written objections.

Because the September 2nd deadline that TQ Delta seeks to extend is in four days, and it makes sense for TQ Delta's Motion to Amend the Scheduling Order to be decided before that date, TQ Delta respectfully requests that resolution of its Motion to Amend the Scheduling Order be expedited and that an order on that motion be issued prior to September 2nd.

Dated: August 29, 2022

Respectfully submitted,

FARNAN LLP

/s/ Michael J. Farnan

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